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10 *Attorneys for Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee, on Behalf*
11 *of the Holders of the Accredited Mortgage Loan Trust 2004-3 Asset-Backed Notes*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 DEUTSCHE BANK NATIONAL TRUST
15 COMPANY, AS INDENTURE TRUSTEE,
16 ON BEHALF OF THE HOLDERS OF THE
17 ACCREDITED MORTGAGE LOAN TRUST
18 2004-3 ASSET BACKED NOTES,

19 Plaintiff,

20 vs.

21 FIDELITY NATIONAL TITLE INSURANCE
22 COMPANY and CHICAGO TITLE
23 INSURANCE COMPANY,

24 Defendants.

Case No.: 2:19-cv-00409-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD FOR
DEUTSCHE BANK TO RESPOND TO
CHICAGO TITLE'S MOTION TO
DISMISS [ECF No. 23]**

(First Request)

25 COMES NOW Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee,
26 on Behalf of the Holders of the Accredited Mortgage Loan Trust 2004-3 Asset-Backed Notes
27 ("Deutsche Bank") and Defendant Chicago Title Insurance Company ("Chicago") (collectively,
28 the "Parties"), by and through their counsel of record, hereby agree and stipulate as follows.

1. On November 22, 2019, Chicago filed a Motion to Dismiss [ECF No. 23];
2. Deutsche Bank's response to Chicago's Motion is due December 6, 2019;

1 3. Deutsche Bank's counsel is requesting an additional twenty-eight (28) days to file its
2 response to Chicago's Motion, and thus requests up to January 3, 2020, to file its
3 Opposition;¹

4 4. This extension is requested to allow Counsel for Deutsche Bank additional time to
5 review and respond to the points and authorities cited to in Chicago's Motion;
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7 5. Counsel for Chicago does not oppose the extension; and
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25 ¹ The Parties intend on filing a Stipulation to Stay Litigation pending the appeal to the Ninth
26 Circuit Court of Appeals in a related matter, entitled *Wells Fargo Bank, N.A. v. Fidelity National*
27 *Title Ins. Co.*, Ninth Cir. Case No. 19-17332 (District Court Case No. 3:19-cv-00241-MMD-
28 WGC), which would also stay Deutsche Bank's deadline to respond to Chicago's Motion. The
instant Stipulation is being submitted in the event the Court does not enter a ruling on the
Stipulation to Stay prior to Deutsche Bank's deadline to respond to Chicago's Motion to
Dismiss.

6. This is the first request for an extension which is made in good faith and not for purposes of delay.

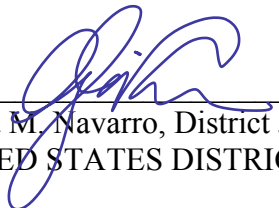
IT IS SO STIPULATED.

DATED this 26 th day of November, 2019.	DATED this 26 th day of November, 2019.
WRIGHT, FINLAY & ZAK, LLP	EARLY SULLIVAN WRIGHT GIZER & McRAE LLP
<u>/s/ Lindsay D. Robbins</u> Lindsay D. Robbins, Esq. Nevada Bar No. 13474 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 <i>Attorney for Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee, on Behalf of the Holders of the Accredited Mortgage Loan Trust 2004-3 Asset-Backed Notes</i>	<u>/s/ Kevin S. Sincliar</u> Kevin S. Sinclair, Esq. Nevada Bar No. 12277 Sophia S. Lau, Esq. Nevada Bar No. 13365 8716 Spanish Ridge Avenue, Suite 105 Las Vegas, Nevada 89148 <i>Attorneys for Defendants, Fidelity National Title Insurance Company and Chicago Title Insurance Company</i>

ORDER

IT IS HEREBY ORDERED that the above Stipulation to Extend Time Period, (ECF No. 26), for Deutsche Bank to Respond to Chicago Title's Motion to Dismiss is **GRANTED.**

Dated this 26 day of November, 2019.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT